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December 14, 2016

VIA ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lydia Howrilka v. City of New York, et al.
15-CV-1113 (KAM) (RER)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to represent the City of New York and Police Officer Bosch (the "City Defendants") in the above-referenced matter. I write on behalf of the parties to request additional time to submit the Rule 41 Stipulation of Dismissal.

As noted in previous correspondence with the Court, the parties have reached an agreement to dismiss this case without the need for further litigation. That arrangement is contingent on the negotiation of a settlement agreement between Plaintiff Lydia Howrilka and co-Defendant Arislyeda Urena. Our understanding is that Plaintiff's counsel, Scott Korenbaum, and Ms. Urena's counsel, Timothy Parlatore, have exchanged drafts and are in the process of negotiating a final agreement. However, Mr. Korenbaum informed us yesterday, December 13, 2016, that his mother-in-law had passed away after an illness, and he has therefore been unable to work on this matter since last week. Mr. Korenbaum requested that we apply to the Court for an additional week for the parties to file the stipulation of dismissal. With the upcoming holidays, however, and to ensure that Mr. Korenbaum has adequate time to attend to his family, the City Defendants believe that a deadline in early January would be more appropriate and more likely to avoid the need for further applications to the Court on this matter.

In light of the foregoing, the City Defendants therefore respectfully request that the Court extend the parties' time to submit the stipulation of dismissal to January 6, 2017.

The City Defendants thank the Court for its attention to this matter.

Respectfully submitted,

Tobias E. Zimmerman
Senior Counsel
Special Federal Litigation Division

cc: Scott A. Korenbaum, Esq. (**via ECF**)
Attorney for Plaintiff

Timothy C. Parlatore, Esq. (**via ECF**)
Attorney for Defendant Arisleyda Urena